

**Monsanto**

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Monsanto Chemical Company  
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January 17, 1994

Ms. Pat Reitz  
U.S. Environmental Protection Agency  
Region 7  
WSTM Division/RCRA Branch  
726 Minnesota Avenue  
Kansas City, Kansas 66101

Re: Monsanto - J. F. Queeny Plant  
RFI Phase II Soil Sampling

Dear Pat:

This is to follow up on the phone conversation you and I had last week regarding the EPA lab's comments on the Monsanto Environmental Science Center's (ESC) proposed SOP for PCB analyses. As I explained in my December 13, 1993 letter, ESC has committed to giving us 24-hour turn-around on the samples and we plan to use this method only for "screening" purposes. Once we think we have delineated the extent of the PCBs using this method, we will send confirmatory samples to Savannah Labs. They will follow the appropriate QA/QC protocols as outlined in the approved RFI workplan.

The intent of using either the field test kits or the method proposed by ESC is to get quick turn-around so we can collect samples and have analytical results quickly. We want to know whether or not we need to step out further from the locations where the PCBs were originally found while the Geoprobe is still at the site. It is certainly in Monsanto's best interest that the results from ESC be accurate so that we are confident that the samples sent to Savannah Labs are, indeed, "confirmatory" and we don't have to remobilize to collect additional samples. However, we had not planned to follow the rigorous QA/QC procedures mentioned in the Agency's January 5, 1994 letter because that would eliminate the possibility of receiving results in 24 hours. This method will certainly give us more accurate results than the field test kits and, yet, we still intend for it to be only a screening method.

Since we are planning to have results within 24 hours, the holding times will, of necessity, be something less than 24 hours.

Please speak with your lab people again and let me know if this approach is acceptable.

I have talked with Geraghty & Miller and we are tentatively scheduling the soil sampling for the week beginning February 14. I will keep you posted as we firm up the date and see what the weather is doing.

If you have any questions, please call me at 314-694-6127.

Sincerely,

  
Jo S. Hanson  
Project Manager

a unit of Monsanto Company



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